

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

CAROLYN YOUNG, a/k/a CARRIE YOUNG, *on behalf of  
herself and all others similarly situated,*

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,  
*a Washington State Corporation,*

Defendant.

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**CLASS ACTION COMPLAINT**

1. Plaintiff, Carolyn Young, a/k/a Carrie Young, alleges violations of the *Fair Debt Collection Practices Act*, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

**JURISDICTION AND VENUE**

2. This Court has jurisdiction under 28 U.S.C. §1331, and 15 U.S.C. §1692k. Venue in this District is proper because Defendant conducts business in this District.

**PARTIES**

3. Plaintiff, Carolyn Young, a/k/a Carrie Young (“Plaintiff”), is a natural person and citizen of the State of Florida, residing in Palm Beach County, Florida.

4. Defendant, Convergent Outsourcing, Inc. (“Defendant”), is a Washington State Corporation engaged in the business of collecting consumer debts, which operates from offices located at 800 SW 39<sup>th</sup> Street, Renton, Washington 98057. Defendant is a licensed consumer debt collector in Florida having license number CCA0900904.

5. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debt.

6. Defendant regularly collects or attempts to collect debts for other parties. Defendant is a “debt collector” as defined by the *FDCPA*.

7. At all times material to the allegations of this Complaint, Defendant was acting as a debt collector with respect to the collection of Plaintiff’s alleged debts.

**FACTUAL ALLEGATIONS**

8. Defendant sought to collect from Plaintiff an alleged debt incurred by Plaintiff for personal, family, or household purposes; more specifically, the debt at issue was from a delinquent credit card.

9. On or about October 6, 2016, Defendant sent a demand letter to Plaintiff that sought to collect an alleged debt due to Jefferson Capital Systems, LLC (The “Demand Letter”). Attached hereto as “Exhibit 1.”

10. The Demand Letter was Defendant’s initial communication with Plaintiff with respect to the debt alleged therein.

11. The Defendant’s Demand Letter stated in part:

Settlement Offer

This notice is being sent to you by a collection agency. The records of Jefferson Capital Systems, LLC show that your account has a past due balance of \$7,583.43.

XXXX

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.**

**NOTICE: PLEASE SEE REVERSE SIDE FOR IMPORTANT CONSUMER INFORMATION.**

We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance.

Emphasis in original.

12. *15 U.S.C. §1692e(10)* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

XXXX

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

**CLASS ACTION ALLEGATIONS**  
**AS TO DEFENDANT**

13. This action is brought on behalf of a Class consisting of (i) all persons with addresses in the Florida Counties that comprise the geographical boundaries of the United States District Court for the Southern District of Florida, namely Miami-Dade, Monroe, Broward, Palm Beach, Martin, Saint Lucie, Indian River, Okeechobee, and Highlands Counties (ii) to whom letters that contained the language: "We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance." (iii) that were mailed, or caused to be mailed by the Defendant attempting to collect on an alleged debt owed to Jefferson Capital Systems, LLC (iv) that were not returned undeliverable by the U.S. Post Office (v) in an attempt to collect a debt incurred for personal, family, or household purposes (vi) during the one-year period prior to the filing of the original Complaint in this action through the date of certification.

14. Plaintiff alleges on information and belief based upon the Defendant's use of the phrase: "We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance." in its letters served upon the Class is so numerous that joinder of all members of the Class is impractical.

15. There are questions of law or fact common to the Class, which common issues predominate over any issues involving only individual Class members. The factual issue common to each Class member is that each was mailed, or caused to be mailed, a letter by Defendant that contained the phrase: "We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance." The common principal legal issue is whether Defendant's wording violated the *FDCPA* by misleadingly stating that "we" (Defendant) could not sue to collect the balance while not stating that the debt was time barred and that the creditor could not lawfully sue to recover the debt.

16. Plaintiff's claims are typical of those of the Class members. All are based on the same facts and legal theories.

17. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has retained counsel experienced in handling actions involving unlawful practices under the *FDCPA* and Class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue this action.

18. Certification of the Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* is also appropriate in that: (1) the questions of law or fact common to the members of the class predominate over any questions affecting an individual member; and (2) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

19. Plaintiff requests certification of a Class under *Rule 23(b)(3)*, of the *Federal Rules of Civil Procedure* for monetary damages; her appointment as Class Representative; and that her attorney, Leo W. Desmond, be appointed Class Counsel.

**COUNT I**  
**VIOLATION OF 15 U.S.C. §1692e**  
**CLASS CLAIM AGAINST DEFENDANT**

20. Plaintiff re-alleges and incorporates Paragraphs 1 through 12.

21. *15 U.S.C. §1692e* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

XXXX

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

22. Defendant mailed, or caused to be mailed the Demand Letter to Plaintiff on behalf of Jefferson Capital Systems, LLC in an attempt to collect a consumer debt, namely to collect alleged debts from Plaintiff's credit card usage.

23. The Demand Letter states in pertinent part: "We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance." (The "Phrase").

24. The Phrase does not state that the debt cannot be collected by either the Defendant or any creditor because the applicable statute of limitations has expired, making the filing of a lawsuit to collect the debt time barred.

25. The Phrase states that "we", meaning the sender of the Demand Letter, namely Defendant, cannot sue to collect the debt.

26. The Phrase does not state that the creditor, Jefferson Capital Systems, LLC (a Florida licensed debt collector, Florida license number CCA9901497) may not legally sue to collect the debt due to the age of the debt, and that the statute of limitations precludes such a collection lawsuit.

27. The Phrase can be interpreted more than one way, such as that while the Defendant (“we”) cannot sue, the creditor or any subsequent creditor could legally bring a collection lawsuit.

28. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

29. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of costs and attorney’s fees pursuant to *15 U.S.C. §1692k*.

**WHEREFORE**, Plaintiff requests that the Court enter judgment in her favor against Defendant that includes:

- a. An Order certifying this matter as a Class action and appointment of Plaintiff as Class Representative as to all claims against Defendant;
- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiff and the Class pursuant to *15 U.S.C. §1692k* for all Class claims;
- d. An award of attorney’s fees, litigation expenses and costs of the instant suit; and
- e. Such other or further relief as the Court deems proper.

Dated: May 31, 2017.

Respectfully submitted,

/s/ Leo W. Desmond  
Leo W. Desmond, Esquire  
Florida Bar Number 0041920

DESMOND LAW FIRM, P.C.  
5070 Highway A1A, Suite D  
Vero Beach, Florida 32963  
Telephone: 772.231.9600  
Facsimile: 772.231.0300  
lwd@desmondlawfirm.com  
*Attorney for Plaintiff*

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS Carolyn Young, a/k/a Carrie Young DEFENDANTS Convergent Outsourcing, Inc.

(b) County of Residence of First Listed Plaintiff Palm Beach (EXCEPT IN U.S. PLAINTIFF CASES) County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number) Leo W. Desmond, Desmond Law Firm, P.C. 5070 Highway A1A, Suite D, Vero Beach, FL 32963 772-231-9600

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only) III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Form with checkboxes for Basis of Jurisdiction (U.S. Government Plaintiff/Defendant, Federal Question, Diversity) and Citizenship of Principal Parties (Citizen of This State, Another State, Foreign Country).

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large grid of checkboxes for Nature of Suit categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): 15 USC 1692 et seq. Violation of the Fair Debt Collection Practices Act. LENGTH OF TRIAL via 3 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ 500,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE May 31, 2017 SIGNATURE OF ATTORNEY OF RECORD Leo W. Desmond FL Bar 0041920



**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

**VI. Related/Refiled Cases.** This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

**VII. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.**

Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

**VIII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Carolyn Young, a/k/a Carrie Young

Plaintiff(s)

v.

Convergent Outsourcing, Inc.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Convergent Outsourcing, Inc.
c/o C T Corporation System (Registered Agent)
1200 South Pine Island Road
Plantation, FL 33324

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Leo W. Desmond, Esq.
Desmond Law Firm, P.C.
5070 Highway A1A
Suite D
Vero Beach, FL 32963

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:



Convergent Outsourcing, Inc.  
 800 SW 39th St./PO Box 9004  
 Renton, WA 98057  
 Mon-Fri 8AM-5PM PT  
 877-495-0400

ATERS001  
 PO Box 1022  
 Wixom MI 48393-1022  
 CHANGE SERVICE REQUESTED

Date: 10/06/2016  
 Creditor: Jefferson Capital Systems, LLC  
 Client Account #: [REDACTED] 3547

Convergent Account #: [REDACTED] 5681  
 Debt Description: Bankatlantic

Carrie Young  
 PO Box 3601  
 Boynton Beach FL 33424-3601

Settlement In Full: \$1,895.86

Total Balance: \$7,583.43

Settlement Offer

Dear Carrie Young:

This notice is being sent to you by a collection agency. The records of Jefferson Capital Systems, LLC show that your account has a past due balance of \$7,583.43.




Our client has advised us that they are willing to settle your account for 25% of your total balance due to settle your past balance. The full settlement must be received in our office by an agreed upon date. If you are interested in taking advantage of this offer, call our office within 45 days of this letter. Your settlement amount would be \$1,895.86 to clear this account in full. Even if you are unable to take advantage of this offer, please contact our office to see what terms can be worked out on your account. We are not required to make this offer to you in the future.

Sincerely,  
 Convergent Outsourcing, Inc.

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.**

**NOTICE: PLEASE SEE REVERSE SIDE FOR IMPORTANT CONSUMER INFORMATION.**

**3 CONVENIENT WAYS TO PAY:**

**Pay Online:** Email our office or pay your bill online with your credit/debit card or checking account at [www.payconvergent.com](http://www.payconvergent.com). Your temporary identification number is: 13.49055681.568

**Pay by Phone:** Please call Convergent Outsourcing, Inc. at 877-495-0400. We offer check by phone, Western Union, and debit card. We offer check by phone, Western Union, and credit/debit card.

**Pay by Mail:** Send Payments to Convergent Outsourcing, Inc., PO Box 9004, Renton WA 98057-9004

PLEASE DETACH THE BOTTOM PORTION WITH YOUR PAYMENT. BEFORE MAILING, PLEASE ENSURE RETURN ADDRESS ON REVERSE SIDE APPEARS CORRECTLY THROUGH THE WINDOW OF THE REPLY ENVELOPE.

240845992  
 738ATERS0018325

877-495-0400  
 Re: Carrie Young

Date: 10/06/2016  
 Creditor: Jefferson Capital Systems, LLC  
 Client Account #: [REDACTED] 3547  
 Convergent Account #: [REDACTED] 5681

Settlement In Full: \$1,895.86  
 Total Balance: \$7,583.43  
 Amount Enclosed: US \_\_\_\_\_

**Select Your Plan:**

- OPPORTUNITY #1 - Lump Sum Settlement Offer of 25%:**  
 Enclosed is my payment of \$1,895.86 (a 75% discount). My account is now satisfied in full.
- OPPORTUNITY #2 - Settlement Offer of 40% & Pay Over 3 Months:**  
 Enclosed is my first payment of \$1,011.12 towards the settlement balance of \$3,033.37 (a 60% discount).
- OPPORTUNITY #3 - Spread Your Payments Over 12 Months:**  
 Enclosed is my first payment of \$631.95 towards the balance due of \$7,583.43.

PLEASE COMPLETE IF PAYING BY CREDIT CARD.	
<input type="checkbox"/>	<input type="checkbox"/>
CARD NUMBER	EXP. DATE
CARDHOLDER NAME	AMOUNT
CARDHOLDER SIGNATURE	\$

If Options 2 or 3 Have Been Selected, Please Enter Monthly

Payment Date and Amount: \_\_\_\_\_ \$ \_\_\_\_\_

If we are calling you in error, please call 855-728-9701 or visit our website at [www.convergentusa.com](http://www.convergentusa.com).

9586

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume the debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

**Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

We cannot sue to collect this debt and providing a partial payment may revive the creditor's ability to sue to collect the balance.

PLEASE DETACH THE BOTTOM PORTION WITH YOUR PAYMENT. BEFORE MAILING, PLEASE ENSURE RETURN ADDRESS  
\*APPEARS CORRECTLY THROUGH WINDOW OF THE REPLY ENVELOPE\*

738ATERS001S325

Date: 10/06/2016  
Creditor: Jefferson Capital Systems, LLC  
Client Account #: [REDACTED] 3547  
Convergent Account # [REDACTED] 5681  
Settlement In Full: \$1,895.86

Total Balance: \$7,583.43

**New Address:**  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ ST \_\_\_\_\_ Zip: \_\_\_\_\_  
Daytime Phone: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_  
Evening Phone: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Convergent Outsourcing, Inc.  
PO Box 9004  
Renton WA 98057-9004



# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Lawsuit: Convergent Outsourcing Conceals Required Info](#)

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